

HUGH F. BANGASSER, (*PRO HAC VICE*)
 RAMONA M. EMERSON, (*PRO HAC VICE*)
 CHRISTOPHER M. WYANT, (*PRO HAC VICE*)
 K&L GATES LLP
 925 Fourth Avenue, Suite 2900
 Seattle, WA 98104-1158
 Phone: (206) 623-7580
 Fax: (206) 623-7022

JEFFREY L. BORNSTEIN, State Bar No. #99358
 K&L Gates LLP
 Four Embarcadero Center, Suite 1200
 San Francisco, CA 94111
 Phone: (415) 249-1059
 Fax: (415) 882-8220

Attorneys for Defendants
 HANNSTAR DISPLAY CORPORATION

**[Additional moving parties and counsel listed
 on signature pages]**

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 (SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

No. 3:07-md-1827 SI
 MDL No. 1827

This Document Relates to Individual Case
 No.10-cv-4572 SI

BEST BUY CO., INC., et al.,

Plaintiffs,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

**STIPULATION AND ~~[PROPOSED]~~
 ORDER WITHDRAWING JOINT
 MOTION TO DISMISS AND MOTION
 FOR JUDGMENT ON THE PLEADINGS
 AND EXTENDING TIME TO RESPOND
 TO AMENDED COMPLAINT**

Date: July 15, 2011
 Time: 9:00 a.m.
 Judge: Hon. Susan Illston

1 Plaintiffs and Defendants, through the undersigned counsel, request that the Court enter
2 the following order to withdraw certain Defendants' Motion to Dismiss and Defendant Chunghwa
3 Picture Tubes, Ltd.'s Motion for Judgment on the Pleadings, and extend Defendants' time to
4 respond to the amended complaint that Plaintiffs will file on or before June 7, 2011.

5 WHEREAS certain Defendants filed a joint motion to dismiss the Complaint in this action
6 on May 10, 2011, dkt. no. 2739, and Defendant Chunghwa Picture Tubes Ltd. filed a motion for
7 judgment on the pleadings on May 10, 2011, dkt. no. 2743 (the "Motions");

8 WHEREAS the hearing on the Motions was originally scheduled for June 17, 2011, and is
9 currently scheduled for July 15, 2011 per the Clerk's Notice dated May 24, 2011, dkt. no. 2806;

10 WHEREAS Plaintiffs, although they oppose the Motions, will exercise their right under
11 Federal Rule of Civil Procedure 15(a) to file a First Amended Complaint in lieu of filing an
12 opposition to the Motions;

13 WHEREAS the parties agree that the briefing dates and hearing associated with the
14 Motions should be withdrawn and that Plaintiffs' will file their First Amended Complaint after
15 the existing deadline to file their opposition to the Motions;

16 WHEREAS the parties further agree that Defendants may have 30 days to respond to the
17 First Amended Complaint from the date that it is filed;

18 THEREFORE, Plaintiffs, by their counsel, and Defendants, by the undersigned counsel,
19 stipulate and agree as follows:

- 20 1. Plaintiffs shall file a First Amended Complaint on or before June 7, 2011.
- 21 2. The Motions shall be withdrawn and the briefing schedule and hearing date
22 stricken.
- 23 3. Defendants shall have 30 days from the date of the filing of the First Amended
24 Complaint to answer or otherwise respond to the First Amended Complaint.

25 **IT IS SO STIPULATED.**
26
27
28

1 Dated: May 25, 2011

ROBINS KAPLAN MILLER & CIRESI, LLP

2
3 By: /s/ David Martinez

4 David Martinez

5 Roman M. Silberfeld (Bar No. 62783)

6 David Martinez (Bar No. 193183)

7 2049 Century Park East, Suite 3400

Los Angeles California, 90067-3208

8 Phone: (310) 552-0130

9 Fax: (310) 229-5800

DMartinez@rkmc.com

Attorneys for Plaintiffs

10
11 K&L GATES LLP

12
13 By: /s/ Christopher Wyant

14 Hugh F. Bangasser, (*Pro Hac Vice*)

Ramona M. Emerson, (*Pro Hac Vice*)

15 Christopher M. Wyant, (*Pro Hac Vice*)

16 K&L GATES LLP

925 Fourth Avenue, Suite 2900

17 Seattle, WA 98104-1158

Phone: (206) 623-7580

18 Fax: (206) 623-7022

19 JEFFREY L. BORNSTEIN, STATE BAR NO. 99358

K&L GATES LLP

Four Embarcadero Center, Suite 1200

20 San Francisco, CA 94111

Phone: (415) 249-1059

21 Fax: (415) 882-8220

22 Attorneys for Defendant HannStar Display
23 Corporation

NOSSAMAN LLP

By: /s/ Christopher Nedeau
Christopher A. Nedeau

Christopher A. Nedeau (Bar No. 81297)
50 California Street, 34th Floor
San Francisco, CA 94111
Tel: (415) 398-3600
Fax: (415) 398-2438

Attorneys for Defendants
AU OPTRONICS CORPORATION AND
AU OPTRONICS CORPORATION
AMERICA

DAVIS POLK & WARDWELL LLP

By: /s/ Christopher Hockett
Christopher B. Hockett (SBN 121539)

Christopher B. Hockett (SBN 121539)
Neal A. Potischman (SBN 254862)
Sandra West (SBN 250389)
Samantha H. Knox (SBN 254427)
Micah G. Block (SBN 270712)
1600 El Camino Real
Menlo Park, California 94025
(650) 752-2000 / (650) 752-2111
chris.hockett@davispolk.com
neal.potischman@davispolk.com
sandra.west@davispolk.com
samantha.knox@davispolk.com
micah.block@davispolk.com

Jonathan D. Martin (admitted pro hac vice)
Bradley R. Hansen (admitted pro hac vice)
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
(212) 450-4000 / (212) 701-5800
jonathan.martin@davispolk.com
bradley.hansen@davispolk.com

Attorneys for Defendants
CHIMEI INNOLUX CORPORATION (F/K/A
CHI MEI OPTOELECTRONICS CORP.),
CHI MEI OPTOELECTRONICS USA, INC.,
AND CMO JAPAN CO., LTD.

MORRISON & FOERSTER LLP

By: /s/ Stephen Freccero

Stephen P. Freccero

Melvin R. Goldman (Bar No. 34097))

Stephen P. Freccero (Bar No. 131093)

Derek F. Foran (Bar No. 224569)

425 Market Street

San Francisco, CA 94105-2482

Tel: (415) 268-7000

Fax: (415) 268-7522

Attorneys for Defendants

EPSON IMAGING DEVICES

CORPORATION, EPSON

ELECTRONICS AMERICA, INC., and

SEIKO EPSON CORPORATION

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Kent Roger

Kent M. Roger (Bar No. 95987)

One Market, Spear Street Tower

San Francisco, CA 94105

Tel: (415) 442-1140

Fax: (415) 442-1001

Attorneys for Defendants

HITACHI, LTD., HITACHI DISPLAYS,

LTD., HITACHI ELECTRONIC

DEVICES (USA), INC.

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

By: /s/ Michael Lazerwitz
Michael R. Lazerwitz

Michael R. Lazerwitz (*Pro Hac Vice*)
Lee F. Berger (Bar No. 222756)
2000 Pennsylvania Avenue, NW
Washington, D.C. 20006
Tel: (202) 974-1500
Fax: (202) 974-1999

Attorneys for Defendants
LG DISPLAY CO., LTD., and LG
DISPLAY AMERICA, INC.

PILLSBURY WINTHROP SHAW PITTMAN
LLP

By /s/ John Grenfell
John M. Grenfell

John M. Grenfell (State Bar No. 88500)
Jacob R. Sorensen (State Bar No. 209134)
50 Fremont Street
San Francisco, CA 94105
Tel: (415) 983-1000
Fax: (415) 983-1200

Attorneys for Defendants
SHARP CORPORATION AND SHARP
ELECTRONICS CORPORATION

GIBSON DUNN & CRUTCHER LLP

By: /s/ Rachel Brass

Rachel S. Brass

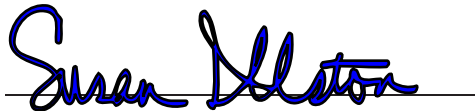
Joel S. Sanders (Bar No. 107234)
Rachel S. Brass (Bar No. 219301)
Rebecca Justice Lazarus (Bar No. 227330)
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933
Tel: (415) 393-8200
Fax: (415) 393-8306

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD.
AND TATUNG COMPANY OF
AMERICA, INC.

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from the above-referenced counsel.

Having considered the foregoing stipulation, and good cause appearing,

IT IS SO ORDERED.



Judge Susan Illston

CERTIFICATE OF SERVICE BY E-MAIL
(Federal Rules of Civil Procedure Rule 5(b))

I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4th Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case, and I am over the age of eighteen years.

I further declare that on May 26th, 2011, I served a copy of:

STIPULATION AND [PROPOSED] ORDER WITHDRAWING JOINT MOTION TO DISMISS AND MOTION FOR JUDGMENT ON THE PLEADINGS AND EXTENDING TIME TO RESPOND TO AMENDED COMPLAINT

by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b):

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 26th day of May, 2011.

Rhonda Hinman
(Signature)